

**FILED**  
DISTRICT COURT OF GUAM

JUN 20 2005 *MP*

MARY L.M. MORAN  
CLERK OF COURT

**ORIGINAL**

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Attorneys for Petitioners

**DISTRICT COURT OF GUAM  
TERRITORY OF GUAM**

JULIE BABAUTA SANTOS, *et al.*,

Petitioners,

vs.

FELIX A. CAMACHO, etc., *et al.*,

Respondents.

CIVIL CASE NO. 04-00006

**MOTION FOR LEAVE TO FILE  
AMENDED CLASS ACTION PETITION**

The Petitioner, individually and on behalf of all those similarly situated (hereinafter "EIC Class"), through her attorneys of record Phillips and Bordallo, P.C., by Michael F. Phillips, moves this Court for leave to file an Amended Petition in the above captioned case, the Amended Petition attached herein.

The parties to this case, through their counsel, have engaged in extensive negotiations for the settlement of this action for the last several months. The parties have reached agreement to finally settle this case. The Attorney General of Guam has refused to participate in the execution of the Settlement Agreement. Concurrently with

this motion, the parties have filed a joint motion for preliminary approval of the Settlement Agreement. Petitioner submits that good cause exists for this Court to grant Petitioner leave to file the attached Amended Petition, in light of the parties having reached a settlement to finally resolve this action as contemplated by that Settlement.

Respectfully submitted this 20th day of June, 2005.

PHILLIPS & BORDALLO, P.C.  
Attorneys for Petitioner

BY:

  
MICHAEL F. PHILLIPS